

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff)	No. 07 CR 851-7
)	
v.)	Judge Robert Gettleman
)	
)	
OSCAR ANDRADE)	
Defendant)	

MOTION TO MODIFY THE CONDITIONS OF RELEASE

Now comes OSCAR ANDRADE, by and through his attorney, Charles J. Aron, and moves this Honorable Court, for an order amending the previously entered release order, allowing the removal of the electronic monitoring component of that order. In support thereof the Defendant, states as follows:

1. OSCAR ANDRADE is the Defendant in the above captioned cause.
2. On or about September 15, 2005, the Court entered an order releasing the Defendant from custody with a component of that release order that the Defendant submit to electronic monitoring.
3. Since the time of the entry of that order, the Defendant has been compliant with all the terms and conditions of the release order.
4. The Defendant is the manager of Cellular Advantage, an AT&T sales center. Because of his close proximity to prospective customers at the sales center, a number of prospective customers have noticed the ankle bracelet and expressed their their displeasure over being serviced by someone wearing such a device.

6. This has caused embarrassment for the Defendant as well as put his job in jeopardy, as sales have been adversely affected.

7. The Defendant's request is only that the electronic monitoring component of his release order be removed and not to amend the order in any other fashion.

8. The attorney for the Defendant has been informed that Pretrial Services has no objection to the entry of the requested order.

Wherefore, it is prayed that this Honorable Court enter an order, modifying the previously entered release order and remove the electronic monitoring component from that order.

Respectfully Submitted,

s/_____
Charles J. Aron
Attorney for OSCAR ANDRADE

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